

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KRISTIN MERONE,

Plaintiff,

-against-

CITY OF NEW YORK and DANIEL G. GARCIA,

Defendants.

**DECLARATION OF
ZACHARY KALMBACH IN
SUPPORT OF DEFENDANTS
CITY AND GARCIA'S
MOTION FOR SUMMARY
JUDGMENT**

24-CV-8730 (BMC)

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ZACHARY KALMBACH, an attorney duly admitted to practice in the Courts of New York, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants the City of New York and Daniel G. Garcia. As such, I am familiar with the facts and circumstances stated herein and submit this declaration in support of defendants' Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

2. Annexed hereto as Exhibit "A" is a true and correct copy of the New York City Police Department I/NetDispatcher Event Chronology, No. D22011422509.

3. Annexed hereto as Exhibit "B" is a true and correct copy of excerpts from the deposition transcript of Officer Matthew Brucato.

4. Annexed hereto as Exhibit "C" is a true and correct copy of the body-worn camera footage of Officer Robert Hakius.

5. Annexed hereto as Exhibit “D” is a true and correct copy of the body-worn camera footage of Officer Edward Sciarrillo.

6. Annexed hereto as Exhibit “E” is a true and correct copy of the body-worn camera footage of Officer Matthew Brucato.

7. Annexed hereto as Exhibit “F” is a true and correct copy of the body-worn camera footage of Officer Andrew Tagliaferro.

8. Annexed hereto as Exhibit “G” is a true and correct copy of the body-worn camera footage of Detective Jason Muller.

9. Annexed hereto as Exhibit “H” is a true and correct copy of the body-worn camera footage of Sergeant Mohsin Mohsin.

10. Annexed hereto as Exhibit “I” is a true and correct copy of the body-worn camera footage of Detective Min Kim.

Dated: New York, New York
August 25, 2025

MURIEL GOODE-TRUFANT
Corporation Counsel of the
City of New York
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By: /s/ *Zachary Kalmbach*
Zachary Kalmbach
Senior Counsel

TO: Via ECF
All counsel of record